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February 10, 2023

VIA DNJ ECF

Hon. Leda Dunn Wettre

United States District Court for the District of New Jersey

Martin Luther King Building & U.S. Courthouse

50 Walnut Street

Newark, N.J. 07101

Re: *Sawhney v. Chubb Insurance Company of New Jersey*

Docket No. 2:21-cv-14675-KSH-LDW

Your Honor:

This firm represents the plaintiffs in the above referenced insurance coverage litigation. The parties have conferred, and this letter is submitted by the parties jointly in response to the court order for a proposed discovery schedule post mediation if the case is not resolved.

Factual Disclosure

All depositions limited to 8 hours unless otherwise court ordered.

All depositions via Zoom unless parties otherwise agree on travel costs.

5/2 Dr. Sawhney

5/9 Dr. Bhardwaj

5/16 William McCudden

5/23 Diane Forstell (pursuant to subpoena) subject to non-party witness availability

5/31 Gary McGowan (pursuant to subpoena) subject to non-party witness availability

6/13 Aiston (pursuant to subpoena) subject to non-party witness availability

6/20 Andrea Pitsch (pursuant to subpoena) subject to non-party witness availability

Expert Disclosure

Expert reports Mutual exchange 8/1

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Responding Expert Reports Mutual exchange 9/1

Expert Depositions

10/4 Kagan (subject to expert witness availability)
10/11 Linsner (subject to expert witness availability)
10/18 Slayter (subject to expert witness availability)
10/25 Firsker (subject to expert witness availability)
11/1 Other Plaintiff (subject to expert witness availability)
11/8 Forstell (subject to expert witness availability)
11/ 21 Pitsch (subject to expert witness availability)
11/29 Other Defendant (subject to expert witness availability)

SJ Motions 12/31

Thank you for your time and consideration.

Respectfully submitted,

Richard A. Fogel

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cc: Cynthia Bernstiel, Esq., George McClellan, Esq., by ECF